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7/11/02
JL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Jeffrey L. Hanes : CIVIL ACTION NO. 1:00-CV-2003
Plaintiff :
v. :
Apple Chevrolet, Inc. et al. :
Defendant : Judge Sylvia H. Rambo

FILED
PAULSBURG, PA

JUL 11 2002

MARY E. ANDREA, CLERK
Per _____ *[Signature]*
Deputy Clerk

PLAINTIFF'S MOTION TO RECOVER COSTS

TO JUDGES OF SAID COURT:

AND NOW, this 8TH day of July, 2002, comes Plaintiff, Jeffrey L. Hanes, by and through his counsel, Sandra I. Thompson, Esquire, to file this Motion to Recover Costs and does state the following:

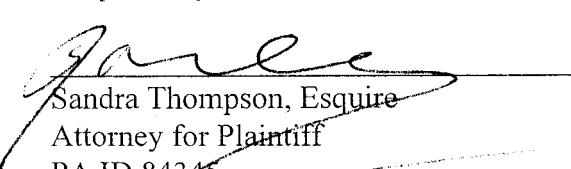
1. On June 27, 2002, this Honorable Court issued an order that addressed outstanding discovery issues.
2. This Court found that Defendants held depositions on April 4, 2002 in violation of the Court's order.
3. As a curative measure, this Court ordered Defendants' to provide a copy of the April 4, 2002 depositions to Plaintiff.
4. This Court further ordered Defendants to bear the costs of producing said transcripts.

5. Upon receipt of the Court's June 27, 2002 order, Plaintiff contacted Defendants to advise that he previously obtained and paid the costs of said transcripts.
6. Defendants refused to fully reimburse Plaintiff for said costs.
7. On July 2, 2002, Plaintiff also advised the Court that he previously paid the costs of said transcripts.
8. The Court instructed Plaintiff to file this motion in light of its June 27, 2002 order.
9. Plaintiff paid \$212.35 for the transcripts of depositions that were taken on April 4, 2002. (A copy of the bill from Key Reporters is attached, incorporated herein, and marked as "Exhibit A". The total bill of \$375.55 also includes the cost of the transcript for Plaintiff's deposition that was held on May 24, 2002.)

WHEREFORE, Plaintiff respectfully requests that this Honorable Court order Defendants to pay the costs for Plaintiff to acquire the April 4, 2002 deposition transcripts in the amount of \$212.35 within ten (10) days. Plaintiff further requests this Honorable Court to order Defendants to make payment to Sandra Thompson, Esquire, on behalf of Plaintiff.

Respectfully Submitted:

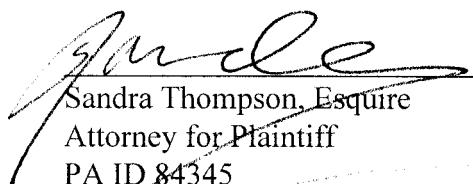
DATED: July 8, 2002


Sandra Thompson, Esquire
Attorney for Plaintiff
PA ID 84345
P.O. Box 2361
York, Pennsylvania 17405
717-845-1408

VERIFICATION

I, Sandra Thompson, Esquire, hereby verify that the statements made in this Motion to Recover Costs are true and correct to the best of my knowledge, information, and belief. I understand that false statements made herein are subject to the penalties for unsworn falsification to authorities as provided in 18 Pa. C.S. §4904.

DATE: July ⁹~~8~~, 2002


Sandra Thompson, Esquire
Attorney for Plaintiff
PA ID 84345
P.O. Box 2361
York, Pennsylvania 17405
717-845-1408

INVOICE No 0860

KEY REPORTERS

1300 Garrison Drive
York, Pennsylvania 17404
(717) 764-7801
FAX 764-6367

Date: 5/31/02

Terms: 1½% interest per month
on accounts not paid
within 30 days.

I.D. No. 23-2258205

TO: Sandra Thompson, EsquireP.O. Box 2361York, PA 17405845.1408

Deposition of Jeffrey Hanes held 5/24/02. Deposition of
Mark Green, Lionel Weathers, Dimitrios Tomboris &
Steven Jones held 4/4/02.

Jeffrey Hanes vs Apple Chevrolet, Inc.

2-pg copies 241 pages, 8 pgs exhibits:

\$ 375.55

Thank you.

(Amy)

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

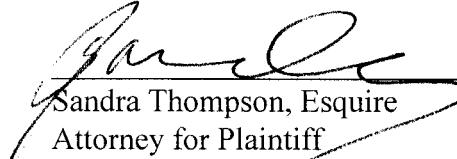
Jeffrey L. Hanes	:	CIVIL ACTION NO. 1:00-CV-2003
	:	
Plaintiff	:	
	:	
v.	:	
	:	
Apple Chevrolet, Inc. et al.	:	
	:	
Defendants	:	Judge Sylvia H. Rambo
	:	

CERTIFICATE OF NONCONCURRENCE

I, Sandra Thompson, Esquire, Attorney for Plaintiff, do hereby certify that Defendants do not concur with Plaintiff's Motion to Recover Costs.

Respectfully Submitted:

DATED: July 8, 2002


Sandra Thompson, Esquire
Attorney for Plaintiff
P.O. Box 2361
York, Pennsylvania 17405
717-845-1408

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Jeffrey L. Hanes : CIVIL ACTION NO. 1:00-CV-2003

Plaintiff

v.

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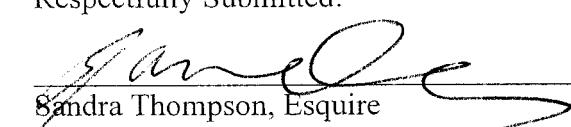
CERTIFICATE OF SERVICE

I, Sandra Thompson, Esquire, counsel for Plaintiff, do hereby certify that I have served Defendants a true and correct copy of Plaintiff's Motion to Recover Costs by postage prepaid first class mail, addressed as follows:

Sara A Austin, Esquire
Blakey, Yost, Bupp, and Rausch, LLP
17 East Market Street
York, Pennsylvania 17401

Respectfully Submitted:

DATED: July 8, 2002


Sandra Thompson, Esquire
Counsel for Plaintiff
PA ID No. 84345
P.O. Box 2361
York, Pennsylvania 17405
717-845-1408